

FLORIDA

Case Number: 22-cv-61553 WPD

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

United States District Court					
SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION					
CRUZ VALDIVIESO FIGUERA, Plaintiffs, vs. ALL VIP CARE INC. AND LIZ VELAZQUEZ MCKINNON, Defendants.			JOINT EXHIBIT LIST CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT		
PRESIDING JUDGE HONORABLE WILLIAM P. DIMITROULEAS		PLAINTIFF'S ATTORNEY FAIRLAW FIRM Brian H. Pollock, Esq. 135 San Lorenzo Ave Suite 770 Coral Gables, FL 33146		DEFENDANT'S ATTORNEY FLORIDA HEALTHCARE LAW FIRM. Randy M. Goldberg Esq., 151 NW 1 st Avenue., Delray Beach, FL 33444	
TRIAL DATE(S) October 23 rd , 2023 10/31		COURT REPORTER Laura Melton		COURTROOM DEPUTY Terrence Crea, Crystal Baines Butler	
JOINT NO	DATE OFFERED	MARKED	OBJECTIONS	ADMITTED	Exhibit
1				10/30	All VIP Care Letter regarding Application
2				u	Application for Contract or Employment*
3				u	Independent Contractor Agreement*
4				u	Acknowledgement of Nurse Registry Policy & Procedure*
5				u	Home Health Aide/Certified Nursing Assistant Job Description
6				u	Affidavit of Compliance with Background Screening
7				u	Independent Contractor Professional Liability Policy
8				u	Waiver of Professional Liability Insurance
9				u	Time Records
10				u	Plaintiff's Paystubs
11				u	HHA Exchange Patient Calendar
12				u	Defendants' Response to Plaintiff's Request for Production
13				u	Defendant, All VIP's Answers to Plaintiff's Interrogatories
14				u	Defendant, Velazquez McKinnon's Answers to Plaintiff's Interrogatories

* Pending the Court's ruling on Plaintiff's Motion in Limine [ECF No. 91], Plaintiff submits that the references

United States District Court					
SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION					
CRUZ VALDIVIESO FIGUERA, Plaintiffs, vs. ALL VIP CARE INC. AND LIZ VELAZQUEZ MCKINNON, Defendants.			PLAINTIFF'S AMENDED EXHIBIT LIST WITH DEFENDANT'S OBJECTIONS CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT		
PRESIDING JUDGE HONORABLE WILLIAM P. DIMITROULEAS		PLAINTIFF'S ATTORNEY FAIRLAW FIRM Brian H. Pollock, Esq. 135 San Lorenzo Ave Suite 770 Coral Gables, FL 33146		DEFENDANT'S ATTORNEY FLORIDA HEALTHCARE LAW FIRM. Randy M. Goldberg Esq., 151 NW 1 st Avenue., Delray Beach, FL 33444	
TRIAL DATE(S) October 20, 2023, 10/31		COURT REPORTER <i>Haura McHorn</i>		COURTROOM DEPUTY <i>Terrence Creary, Crystal Davis Bollen</i>	
PLTF. NO	DATE OFFERED	MARKED	OBJECTIONS	ADMITTED	Exhibit
1			A, I, H, R UP		Cesar Izique Sr. Letter Statement
2			A, I, H, R UP		All VIP Website Homepage
3			A, I, H, R UP		Check #517,
4			A, I, H, R UP	10/30	Check #2414
5			A, I, H, R UP		Unpaid Wages email to Leslie Rodriguez
6			A, I, H, R UP		Email from Ana Maria Rowland
7			A, I, H, R UP		Humana Records
8			A, I, H, R UP		Google Review to All VIP Care Inc.
9			A, I, H, R UP		Text Messages from Evelyn Vapi
10			A, I, H, UP		Text Messages between Plaintiff and Diane Ramirez
11			A, I, H, UP		Excel Spreadsheet Summarizing Pay Records

Plaintiff reserves the right to amend this exhibit list.

Respectfully Submitted on October 17, 2023.

s/Brian H. Pollock, Esq.
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